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January 28, 2025

### **VIA ECF**

The Honorable Paul G. Gardephe, U.S.D.J.  
U.S. District Court for the Southern District of New York  
40 Foley Square, Courtroom: 705  
New York, NY 10007

**Re: *In re Columbia College Rankings Action,*  
Case No. 1:22-cv-05945-PGG (S.D.N.Y.)**

Dear Judge Gardephe:

This firm represents Plaintiffs Ravi Campbell and Student B (“Plaintiffs”) in the above-referenced consolidated action (the “Action”). Pursuant to this Court’s instruction during the October 24, 2024 case management hearing (*see* ECF No. 88, at 7:8-10), we submit this joint letter on behalf of Plaintiffs and Defendant the Trustees of Columbia University in the City of New York (“Defendant”) regarding the mediation that occurred on January 21, 2025.

Both Counsel for Plaintiffs and Defendant traveled from New York (as well as an Associate from the United Kingdom for Plaintiffs) to Philadelphia to attend the mediation with a well-respected and experienced mediator – The Honorable Diane M. Welsh (Ret.) of JAMS. In advance of the mediation, the Parties thoroughly prepared, assessed the merits of their cases, and exchanged detailed mediation statements. However, the mediation ended without a settlement.

The Parties are now proceeding with discovery. As such, the Parties have so far stipulated that documents produced thus far for mediation purposes may be considered as also produced for discovery purposes, subject to applicable objections and consistent with the Stipulated Protective Order. The Parties are also negotiating deposition dates, further document production, and other discovery matters.

*The Honorable Paul G. Gardephe, U.S.D.J.*  
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The Parties are available should the Court require any further assistance.

Respectfully submitted,

**GAINEY McKENNA & EGLESTON**

*Thomas J. McKenna*

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*Counsel for Plaintiffs and  
the Putative Class*

**DEBEVOISE & PLIMPTON LLP**

*Maura K. Monaghan*

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*Counsel for Defendant*

cc: All Counsel of Record (via ECF)